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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,

No. 2:20-cv-00047-DWL

Plaintiff,

vs.

**James D. Noland, Jr., a/k/a Jay
Noland and J.D. Noland,
individually and as an officer of
Success By Media Holdings Inc.,
Success By Media LLC, Enhanced
Capital Funding, and Rinpark SA
et al.,**

**SECOND SUPPLEMENTAL
MEMORANDUM TO
INTERVENORS' RULE 24
MOTION TO INTERVENE**

Defendants.

Intervenors,¹ a group of affiliates of SBH,² hereby file this Second Supplemental Memorandum to Proposed Intervenors' February 18, 2021 Rule 24 Motion to Intervene (Dkt. No. 274) (the "Motion"), to inform the Court of a further material change in circumstances of Intervenors. Specifically, as of the filing of the Motion, Intervenors numbered 276. Intervenors filed a Supplemental Memorandum (Dkt. No. 283) advising the Court of additional individuals who engaged undersigned counsel in this matter as Intervenors, and joining in the

¹ For brevity and clarity, terms defined in Intervenors' February 18, 2021 Rule 24 Motion to Intervene (Dkt. No. 274) are incorporated by reference and utilized herein.

² As used herein, "SBH" refers to any or all of the corporate defendants with whom Intervenors have contractual agreements for SBH's services.

1 Motion. Since filing the Supplemental Memorandum, further individuals have engaged
2 undersigned counsel and join in the Motion. A list of the additional Intervenors is appended
3 hereto as Exhibit “A” and incorporated herein by reference. Accordingly, at present, 543
4 affiliates of SBH, the very consumers that the FTC purportedly seeks to protect, seek to
5 intervene in this matter, as set forth in the Motion.
6

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8 Respectfully submitted,

9 /s/ Maurice R. Mitts

10 Maurice R. Mitts, Esq. (*pro hac vice*)

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15 Attorney for Proposed Intervenors
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EXHIBIT A

“EXHIBIT A” ADDITIONAL INTERVENORS – SUCCESS BY HEALTH AFFILIATES

David Jesse Duran	Paula Christy Loy
Miranda Laine Haley	Thomas Loy
David Small	Yevonne Carraway Pawloski
Chad Anderson	Ashley Phillips
John Archuleta	Worden Rustemeyer
Kimberly Archuleta	Joseph Spsychalski
Katelin Bassett	Stacie Starkey
Joie Lane Bier	Rebecca Summers
Melanie Boltze	Scott Summers
Anthony Boston	Linda Tocco
Maurice Allen Boston	Michelle Tocco
Marty Buss	James Todd
Daniel Carroll	Julie Villalobos
Meredith Carroll	Matthew Villalobos
Angela Coen	Inge Volgelmann
Tracy Cornell	Patte Waddell
Rosemary Crawford	James Wilson
Margaret Eiser	Kimberly Wilson
Gerald Fletcher	Brendon Michael Porter
Tamera Fletcher	Gary Lee Tuck
Ruth Fluharty	Heather Marie Tuck
Aaron Fyre	Samantha Renae Porter
Jodi Gillman	Sherrie Lynn Tuck
Shirley Harvil	Hugo Bernard Olof Wikstrom
Michael Highley	Donald Miller
Andrea Loy	William Chester Henderson

Certificate of Service

I, Maurice R. Mitts, certify that the original **Supplemental Memorandum to Intervenors' Rule 24 Motion to Intervene** was e-filed this 24th day of March, 2021, with the clerk of the court's CM/ECF filing system, and copies were emailed via the court's ECF filing system this same day to all parties of record in this matter.

/s/ Maurice R. Mitts

Maurice R. Mitts, Esquire